

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Alexandria Division

<b>UNITED STATES OF AMERICA,</b>	:	
	:	
<b>v.</b>	:	<b>Criminal Case No. 1:18-CR-457 (AJT)</b>
	:	
<b>BIJAN RAFIEKIAN</b>	:	
	:	
<b>and</b>	:	
	:	
<b>KAMIL EKIM ALPTEKIN,</b>	:	
	:	
<b>Defendants.</b>	:	

**DEFENDANT BIJAN RAFIEKIAN’S EMERGENCY MOTION  
FOR LEAVE TO REMOVE AND REPLACE SEALED EXHIBIT D  
TO DOCUMENT NO. 269 IN ANTICIPATION OF UNSEALING**

Defendant, through counsel, respectfully requests that the Court withdraw sealed Exhibit D to Document No. 269 in anticipation of unsealing and substitute it with the document delivered to the Clerk’s office.

The exhibit contains personal identifying information and should be replaced to protect the parties’ privacy. Defendant will deliver a redacted version of the relevant exhibit to the Clerk’s office.

WHEREFORE, Defendant respectfully requests that the Court remove and replace the exhibit identified above.

Dated: July 8, 2019

Respectfully submitted,

/s/  
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/s/  
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**CERTIFICATE OF SERVICE**

I hereby certify that, on the 8th day of July 2019, true and genuine copies of Defendant's Emergency Motion for Leave to Remove and Replace Sealed Exhibit D to Document No. 269 in Anticipation of Unsealing and Proposed Order were sent via electronic mail by the Court's CM/ECF system to the following:

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/s/  
Robert P. Trout (VA Bar # 13642)